

From: [Bill Jacobs](#)  
To: [elray.roper@syngenta.com](mailto:elray.roper@syngenta.com)  
Bcc: [Meredith Laws](#); [John Hebert](#); [Dan Peacock](#)  
Subject: Re: Syngenta Multiplex Rodent bait station  
Date: 09/10/2008 12:54 PM  
Attachments: [Multiplex Station EPA evaluation 5 31 07.pdf](#)

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A reasonably firm lip on the bait tray insert (or on the station itself) is a design feature that is needed to meet criterion #6 for tamper-resistant bait stations (see PR Notice 94-7). If such a feature were added, the station could be added to the list of "adequately protective" units. The units listed there are bait stations that are sold empty. The testing that was done on the unit with dogs and children addressed issues related to other criteria, principally #2 & #4, and would not have to be repeated.

The center rod position would not necessarily have to be removed, but instructions accompanying the unit should advise against using the center rod position when the station is deployed in areas where young children (under 6 years old) are likely to be present. Statistically, the present design passed the child test. It's just that the 2 kids who were able to touch the bait contacted bait that was on the center rod.

Keep in mind that the above discussions pertain to the marketing of the station in the "empty" condition (i.e., without bait packaged in or with the unit). If the station were sold as part of a ready-to-use bait-station product, dog and child tests with unsecured units would have to be run if you desired to have it labeled as a Tier 1 or Tier 2 product. For Tier 3, child testing with unsecured units would be needed. Adult-utility testing would be needed for Tiers 1, 2, or 3.

If you elect to modify the mold for the bait station to add a lip or remove the center rod position, you might also consider beefing up the hinge arrangement that holds the lid to the base and perhaps providing additional overlap to the locking mechanism. Although I rated the current and original designs sufficient in those areas, they are potential weak points relative to other components of the product's design. I have received "unsolicited feedback" to the effect that the lids on locked units can be lifted without need to use the special tool by simply pulling up hard on the tab. That was not my experience when I evaluated the original design in 2003 or the current design in 2007. However, I did find that units would not fully lock unless the lid was pushed down until a distinctly audible "snap-to" sound was heard. A unit closed not quite to the "snap-to" point may appear to be locked but can be opened relatively easily. If it does not already, the product's literature should indicate how to confirm that the locking mechanism is fully engaged.

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09/10/2008 11:58 AM

To: Bill Jacobs/DC/USEPA/US@EPA  
cc:  
Subject: Syngenta Multiplex Rodent bait station

Bill:

Last year when we were in Hawaii together we discussed what modifications would need to be made to the Multiplex Rodent bait station so that it could pass the EPA Tamper resistant guidelines for child resistance.

Syngenta asked if we put a lip on the insertable bait tray would that meet the requirement in the assessment to add a lip so bait crumbs would not fall out of the station.

In addition we would need to remove the center bait rod position so a child could not reach into the station and touch the bait.

If these two modifications are made will the bait station, in your opinion, meet the tamper resistant guidelines without being retested?

Sincerely,  
ElRay M. Roper, PhD  
Senior Technical Representative  
Syngenta Professional Products  
Phone: 707-208-5173

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